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IN THE MATTER OF:

Nelson I. Antonio aka Pedro I Antonio

DEBTOR(S),

**IN THE UNITED STATES  
BANKRUPTCY COURT FOR THE  
DISTRICT OF NEW JERSEY**

CHAPTER 13  
CASE NO. 19-10706 ABA

**NOTICE OF OBJECTION**

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **Toyota Motor Credit Corporation**, the holder of a Mortgage on the debtors' premises at **2013 Toyota 4Runner, VIN: JTEBU5JR7D5111608** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. On February 08, 2019, Secured Creditor filed a secured proof of claim in the amount of \$29,724.00 with pre-petition arrears in the amount of \$800.36 and an annual interest rate of 6.350000%.
2. Debtor's plan provides for payment in the amount of \$21,292.00 towards the arrearage claim of the Secured Creditor.
3. Debtors plan attempts to modify the value of the Secured Creditor's and does not provide proof of said value.
4. The interest rate provided in Debtor's Plan is not in compliance with Till v. SCS Credit Corporation, 541 U.S. 465 (2004).
5. Debtor's Plan understates the amount of the Secured Creditor's claim by \$8,432.00, and does not provide sufficient funding to pay said claim.
6. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
7. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

**/s/ Denise Carlon, Esquire**

Denise Carlon, Esquire

Attorney for Toyota Motor Credit Corporation

Dated: February 13, 2019